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ATTORNEY FOR DEFENDANT JOSEPH DIBEE

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA,
Plaintiff,

Case No. 6:06-cr-60011-AA-1

**UNOPPOSED MOTION TO
CONTINUE TRIAL DATE**

vs.

JOSEPH DIBEE,
Defendant(s).

Joseph Dibee, through counsel, Matthew Schindler, moves the Court to continue the trial date from December 22, 2020 for approximately 90 days. This motion is made based on the need for time to complete reviewing discovery, investigate the case, conduct research, litigate motions, and consult with Mr. Dibee.

It is further supported by the linked Declaration of Matthew Schindler.

Mr. Dibee requests the court find that this continuance constitutes excludable delay pursuant to Title 18 §§ 3161(h)(7)(A) and (B). The ends of justice served by granting this motion outweigh the best interests of the public and Mr. Dibee in a speedy trial because the additional time is necessary to afford defense counsel

sufficient time to review discovery, investigate the case, conduct research, consult with Mr. Dibee, and prepare his case for trial

The government has no objection to this request.

Respectfully submitted on December 18, 2020.

s/Matthew Schindler

Matthew A. Schindler, OSB#964190
Attorney for Joseph Dibee